

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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*This document relates to:*

*Federal Insurance Co. v. al Qaida*, 03 CV 6978 (RCC)  
*Ashton v. Al Qaeda Islamic Army*, 02 CV 6977 (RCC)  
*Thomas Burnett, Sr. v. Al Baraka Investment & Develop. Corp.*, 03 CV 9849 (RCC)  
*Barrera v. Al Qaeda Islamic Army*, 03-CV-7036 (RCC)  
*Salvo v. Al Qaeda Islamic Army*, 03-CV-5071 (RCC)  
*Burnett v. Al Baraka Investment & Develop. Corp.*, 03-CV-9849 (RCC)

**AFFIRMATION OF SEAN P. CARTER TRANSMITTING SUPPLEMENTAL  
EVIDENCE IN OPPOSITION TO THE MOTIONS TO DISMISS OF THE KINGDOM  
OF SAUDI ARABIA, INTERNATIONAL ISLAMIC RELIEF ORGANIZATION,  
RABITA TRUST, WA'EL HAMZA JULAIDAN, SAUDI HIGH COMMISSION, AL  
HARAMAIN ISLAMIC FOUNDATION (SAUDI ARABIA), PRINCE SALMAN BIN  
ABDUL AZIZ AL SAUD, PRINCE NAIF BIN ABDUL AZIZ AL SAUD AND  
MOHAMMAD JAMAL KHALIFA**

Sean P. Carter, Esq., affirms as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above captioned matter, and a member of the law firm Cozen O'Connor. I submit this Affirmation to transmit to the Court additional documents submitted in opposition to the Motions to Dismiss filed by the following defendants in these consolidated proceedings: the Kingdom of Saudi Arabia, International Islamic Relief Organization, Rabita Trust, Wa'el Hamza Julaidan, Saudi High Commission, Al Haramain Islamic Foundation (Saudi Arabia), Prince Salman bin Abdul Aziz al Saud, Prince Naif bin Abdul Aziz al Saud and Mohammad Jamal Khalifa.

2. In connection with several previous filings, plaintiffs have submitted to the Court a true and accurate copy of *The Second Report of the Monitoring Group on Sanctions on al*

*Qaida, the Taliban, and individuals and entities associated with them*, published by the United Nations Security Council on December 2, 2003 (hereinafter the “UN Report”).

3. On page 15 of the UN Report, the Security Council Monitoring Group on al Qaida and the Taliban references and cites to a “recently published report by the United States Central Intelligence Agency” (hereinafter the “CIA Report”).

4. Footnote d on page 15 of the UN Report indicates that excerpts from the text of the CIA Report are available through the Internet at <http://www.centerforsecuritypolicy.org/cia96charities.pdf>.

5. Attached hereto as Exhibit 1 is a true and accurate copy of the document retrieved from <http://www.centerforsecuritypolicy.org/cia96charities.pdf>.

Affirmed in Philadelphia, Pennsylvania on November 1, 2004.

Sean P. Carter

/s/

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